

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admission *pro hac vice* pending)

***PROPOSED ATTORNEYS FOR DEBTOR***

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**APPLICATION FOR ORDER SHORTENING TIME**

TO: THE HONORABLE MICHAEL B. KAPLAN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel, requests that the time period to notice a hearing on the *Debtor’s Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “Motion”)<sup>2</sup> as required by

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor commenced this Chapter 11 Case to pursue confirmation of a plan of reorganization, the material terms of which have been agreed to by plaintiff law firms on behalf of more than 60,000 current talc claimants in plan support agreements. See First Day Decl. ¶¶ 72-73. Pursuant to these agreements, the firms have agreed to use commercially reasonable efforts to work together with the Debtor, Johnson & Johnson and Johnson & Johnson Holdco (NA) Inc. to finalize and file a plan of reorganization by May 14, 2023 or as soon thereafter as is feasible that contains the agreed plan terms. Id. ¶ 73.

The appointment of Ms. Ellis as the Future Claimants' Representative as soon as practicable is critical to ensure that a key constituency of the Debtor—future claimants—is well represented and effective plan negotiations with that constituency can commence expeditiously on the time frame contemplated by the plan support agreements. As is also stated in the Motion, the Debtor believes that Ms. Ellis' unique expertise with respect to the Debtor's future claimants given her prior position in the 2021 Chapter 11 Case, her many years of experience serving in a broad range of fiduciary capacities and her many years of practice make her highly qualified and particularly well-suited to represent the interests of the future claimants in this Chapter 11 Case promptly and effectively. Accordingly, the Debtor respectfully submits that it is necessary and appropriate for the Court to consider the Motion on shortened notice.

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on April 18, 2023, or on a date and time which is most convenient for the Court.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The applicant requests entry of the proposed order shortening time.

Dated: April 10, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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